

The United States Attorney charges that:

- At all times relative to this information, KATHY D. RANKIN, the defendant herein, was employed as a Customer Service Agent for Union Pacific Railroad.
- 2. From September, 2001, until July, 2004, **KATHY D. RANKIN**, the defendant herein, was the Financial Secretary-Treasurer for the Transportation Communications Union International, Lodge 512, a labor organization.
- 3. At all times relative to this information, Lodge 512 operated out of 324 O'Farrell, Collinsville, Illinois. This was the residence of **KATHY D. RANKIN**, the defendant herein.
- 4. At all times relative to this information, Lodge 512 maintained a checking account at Missouri State Bank, 100 South 4th Street, St. Louis, Missouri. **KATHY D. RANKIN**, the defendant herein, had access to this account.
  - 5. Between September 2003 and August 2004, within the Eastern District of Missouri and

elsewhere,

## KATHY D. RANKIN,

the defendant herein, knowingly, unlawfully and willfully stole, abstracted or converted to her own use, approximately \$15,622.34 in moneys or funds of a labor organization, to wit: the Transportation Communications Union International, Lodge 512.

In violation of Title 29, United States Code, Section 501(c).

Respectfully submitted,

CATHERINE L. HANAWAY United States Attorney

HOWARD J. MARCUS #16980 Assistant United States Attorney 111 South 10th Street, Room 20.333 St. Louis, Missouri 63102 (314) 539-2200

UNITED STATES OF AMERICA	)	
EASTERN DIVISION	)	SS.
EASTERN DISTRICT OF MISSOURI	)	

I, Howard J. Marcus, Assistant United States Attorney for the Eastern District of Missouri, being duly sworn, do say that the foregoing information is true as I verily believe.

HOWARD J. MARCUS #16980

Subscribed and sworn to before me this \_\_\_\_\_ day of October 2007.

CLERK, U.S. DISTRICT COURT

DEPUTY CLERK